

## **Region 3 GPRA Baseline RCRA Corrective Action Facility**

# **Cook Composites and Polymers Co.**

**Hwy #29 Tight Squeeze Industrial Park**

**Chatham, VA 24531**

**Congressional District No. 5**

**EPA ID No. VAD055046049**

**Last updated 7/01/05**

## **Current RCRA CA Activities**

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RCRA Corrective Action (CA) activities at the Cook Composites and Polymers (CCP) facility are being conducted under the direction of the Department of Environmental Quality (DEQ). The CA investigations and any necessary clean up activities are being implemented in accordance with the conditions and requirements of CCP's Hazardous Waste Management Permit under the CA modules and attachments.

### **Past 18 Months**

December 2003- A *Phase II RFI Report* was submitted in accordance with the initial RCRA Facility Investigation (RFI) Report schedule.

January 15, 2004- DEQ informed CCP that the *Phase II RFI Report* submittal did not include all of the RFI information in accordance with the facility's Permit and the approved RFI Work Plan.

January 5, 2004- Outstanding items of the *Phase II RFI Work Plan* submitted (air dispersion model, soil sampling locations, justification for hazardous constituents of concern).

March 31, 2004- Notice of Deficiency (NOD) sent for the CCP January 5 re-submittal. Revised Work Plan addressing the items delineated in the NOD required.

May 21, 2004- *Surface Soil Sampling and Evaluation Plan* submitted in response to the DEQ's March 31 NOD as a component part of the Phase II RFI Work Plan – Revision 2, dated May, 2003.

August 5, 2004- DEQ grants conditional approval of the *Surface Soil Sampling and Evaluation Plan*, dated May 21, 2004. The *Surface Soil Sampling and Evaluation Report* submittal is anticipated in January 2005. .

May 5, 2004, *Flow-Through Process Tank Replacement Report* submitted. The DEQ considers the work in this project as an interim measure (IM) subject to CA oversight as the underground flow-through process tanks were co-located with solid waste management unit (SWMU) No. 26, the tank farm drain system, and SWMU No. 27, the tank farm sump. SWMU No. 26 drains to SWMU No.

27. Sample data from SWMU No. 27 has shown past evidence of groundwater contamination and a release of HCOCs to the environment.

May 6, 2004- DEQ advised CCP that a newly identified solid waste management unit (SWMU), a septic tank and drainfield, was identified by the DEQ staff during a recent review of DEQ files. CCP was instructed to provide documentation of the investigation findings regarding this new SWMU in the forthcoming *Final Phase II RFI Report*.

September 29, 2004- the DEQ disapproved the *Flow-Through Process Tank Replacement Report* by letter. CCP also provided with information regarding needed revisions and/or references in the forthcoming *Final Phase II RFI Report* submittal.

December 10, 2004- *Flow-Through Process Tanks Replacement Report – Revision 1*, dated December 2004, submitted in response to the DEQ comments of September 29, 2004.

January 28, 2005- URS submitted correspondence and provided the DEQ with the *Surface Soil Sampling and Evaluation Results Report*, containing essential information and final elements needed for completion of the *Final Phase II RFI Report*.

As of January 2005- *Phase II RFI Report* has undergone technical review and staff comments have been developed for: 1) risk assessment elements and the risk assessment's consistency with the *Phase II RFI Work Plan – Revision 2*, dated May 2003, and 2) the environmental setting and groundwater results. The DEQ's technical review comments from the risk assessment and groundwater staff have been sent to the CCP facility by correspondence, dated June 14, 2005, to enable CCP to continue to develop the *Final Phase II RFI Report*.

The *Phase II RFI Report* has undergone review by the project manager and the DEQ's remaining comments on the above Report should be sent to the CCP facility within July 2005. The DEQ's technical review comments regarding the above submittal will allow CCP to address needed revisions in the forthcoming *Final Phase II RFI Report* submittal. (See Summary of Phase II RFI Report Findings for a detailed summary of the Phase II RFI Report evaluation and findings.)

### **Historical Background and Summary of CA Activities**

On July 8, 1996, the Virginia Department of Environmental Quality (DEQ) issued a Hazardous Waste Management Permit for storage and treatment of hazardous waste to Cook Composites and Polymers (CCP) located in Chatham, Virginia. The above Permit was issued under the authority of the Virginia Hazardous Waste Management Regulations (VHWMR) which incorporates the requirements of the Resource Conservation and Recovery Act (RCRA), by reference. The DEQ was delegated authority by the Environmental Protection Agency (EPA) to administer the RCRA Permitting Program through the VHWMR.

The above Permit included Corrective Action (CA) permit conditions and requirements as necessary to protect human health and the environment. The CA permit conditions required the CCP facility to investigate and address all releases of hazardous waste or hazardous constituents from the facility, regardless of the time the release occurred. In October 1996, CCP completed a Screening Investigation (SI) to determine whether releases to the environment had occurred from Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs). Based on the results from the SI, and in accordance with the requirements of their Permit, CCP performed a more focused investigation, which was called a Verification Investigation (VI). Under the VI, samples were taken of the soils, subsoils, groundwater, sediment, and surface water to determine the nature and extent of contamination on site. A VI Report, dated June 4, 1999, was submitted to the DEQ for review and approval.

The DEQ determined that an additional site investigation and evaluation was needed to further characterize contamination in various media and to establish whether the contaminant levels in all of the media are protective of human health and the environment. The DEQ provided conditional approval of the VI Report by correspondence dated July 12, 2001. This conditional approval required CCP to submit a RCRA Facility Investigation (RFI) Work Plan to the DEQ for approval to further investigate and report on the nature and extent of the releases at the Chatham facility. Requirements for the RFI were specified in the DEQ correspondence dated July 26, 2001, September 20, 2001, and September 28, 2001. The RFI is necessary to comply with the requirements of the DEQ and the EPA.

The RFI Work Plan requirements includes additional sampling of soils, subsoils, groundwater, sediment, surface water, and stormwater from sample areas identified as requiring further investigation. Data from sampling and testing of the above media will undergo a risk assessment and will be evaluated for the potential impacts to human health and the environment.

In addition, the RFI will include engineering and hydrogeologic evaluations of the existing engineered control measures already in-place at the facility. The existing engineered control measures were installed at this facility under the authority of the State Water Control Board (SWCB) under a previous Special Order and Release Agreement issued to Freeman Chemical Corporation in 1981 and 1982, respectively. (CCP has owned and operated the former Freeman Chemical facility since 1990.) The existing engineered control measures (remediation measures) include the following: two groundwater pump and treat systems, soil removal actions, and the installation of an engineered landfill cap over a large area at the site which showed past soil and groundwater contamination. These measures are summarized in the 1999 VI Report.

The RFI evaluations of the existing engineered control measures are to establish whether additional corrective action or remediation measures are needed to minimize migration of contaminants from soils to groundwater, and groundwater to surface water and/or sediments. The potential impact of the contaminant migration to surface waters and nearby wetlands will be more fully assessed and evaluated

under current conditions.

A Phase II RFI Work Plan was submitted to the DEQ on January 8, 2002. The DEQ's review comments were provided to CCP by correspondence, dated September 30, 2002. A revised Phase II RFI Work Plan was submitted to the DEQ by CCP on November 27, 2002. On March 31, 2003, the DEQ provided conditional approval of the Phase II RFI Work Plan, contingent upon submittal of correspondence and a Phase II RFI Work Plan Addendum, which addressed the DEQ's itemized comments in the conditions of approval.

A Phase II RFI Work Plan, Revision 2 was submitted to the DEQ on May 21, 2003. The above revised Work Plan and correspondence addressed the agency's itemized comments in the DEQ's conditional approval, dated March 31, 2003.

The CCP facility's Hazardous Waste Management Permit underwent a Class 2 permit modification to incorporate the CA permit modules and attachments under the Hazardous and Solid Waste Amendments (HSWA) of the RCRA. (Spring-Summer, 2003) The Permit modification was approved by the DEQ effective September 19, 2003. The Permit modification request underwent a public notice mailing and a publication in a major local newspaper, and a public meeting was held in accordance with the requirements of the RCRA Regulations. The Permit's CA modules and attachments outline the plan for further action and provide specific detailed requirements for the evaluation of the nature and extent of releases at the Chatham facility. The Permit CA modules and attachments require a complete human health and ecological risk-assessment associated with the releases at the site.

CCP was sent a confirmation letter and comments regarding their submitted correspondence and the Phase II Work Plan, Revision 2 by DEQ correspondence, dated June 27, 2003. The RFI Report was scheduled to be submitted to the DEQ within 180 days of the DEQ's confirmation letter. The RFI Report was initially scheduled to be submitted on December 24, 2003.

CCP also submitted a Flow-Through Process Tank Replacement Work Plan, dated September 10, 2002. (This above work plan is considered by the DEQ to a component part of the facility's revised Phase II RFI Work Plan.) The DEQ considers the replacement of these underground flow-through process tanks as an Interim Measure (IM) under CA due to the co-location of these process tanks with the Solid Waste Management Unit (SWMU) No. 26, Tank Farm Drain System, and the past evidence of a release from this area. The DEQ provided CCP with review comments of this IM Work Plan by correspondence dated December 20, 2002. A Flow-Through Process Tank Replacement Work Plan – Revision 1, dated February 21, 2003, was submitted by CCP. The DEQ provided CCP conditional approval of the Flow-Through Process Tank Replacement Work Plan – Revision 1 by correspondence, dated March 31, 2003. Items of the conditional approval were specified in the above DEQ correspondence.

CCP correspondence was submitted to the DEQ, dated May 19, 2003, to provide clarification and/or

a response to each item of the DEQ's conditional approval of the Flow-Through Process Tank Replacement Work Plan. The DEQ provided CCP with correspondence, dated June 27, 2003, to further clarify requirements of the DEQ's conditional approval of this IM Work Plan. The tank removal activities associated with this IM were scheduled to begin in June 2003, contingent upon completion of the installation of the new process tanks. The site investigation evaluations, data, and findings during the IM tank removal activities are to be included in the evaluations, risk-assessment, and findings of the RFI Report.

On November 20, 2003, the DEQ sent correspondence to CCP which suggested that the CCP facility request an extension of the previously scheduled RFI Report submittal date beyond December 24, 2003. The DEQ had believed that the extension of the RFI Report submittal date was appropriate due to some outstanding unresolved issues of the RFI Work Plan associated with the completion of the facility's site-specific risk assessment. The above DEQ correspondence provided CCP with technical review comments regarding an air dispersion model submitted in CCP correspondence, dated August 26, 2003. The above DEQ correspondence also addressed some outstanding information pertaining to the historical operation of the incinerator at CCP which needed to be submitted and reviewed by the DEQ.

The detailed information regarding the air dispersion model and the historical operation of the hazardous waste incinerator at CCP is required to establish the following for the RFI: 1) the air deposition soil sample areas and locations and, 2) the HCOCs for this soil sampling initiative. Information on the air dispersion model and the historical operation of the incinerator are components of the RFI Work Plan were required to be submitted to the DEQ for approval. CCP was requested to submit information on the above two items within 30 days of receiving the DEQ's correspondence, dated November 20, 2003. Information on the above two items was subsequently submitted by CCP in the URS submittal, dated January 5, 2004.

A *Phase II RFI Report*, dated December 2003, was submitted by correspondence from the URS Corporation, dated December 23, 2003, in accordance with the initial RFI Report schedule. However, CCP was advised that the above submitted RFI Report would not be considered the *Final Phase II RFI Report* by the DEQ as the above submitted Report did not include all of the required RFI information in accordance with the facility's Permit and the approved RFI Work Plan.

In addition to the above, CCP had not completed the scheduled work and evaluations associated with the DEQ's conditional approval of the *Flow-Through Process Tanks Replacement Work Plan – Revision 1*, dated February 21, 2003, an RFI interim measure. The findings from this above Report are to be included in the *Final Phase II RFI Report*.

(See text above under Past 18 Months for most recent CA activity for the CCP site.)

### **Summary of Phase II RFI Report Findings**

The text, tables, and figures from the submitted components of the *Phase II RFI Report*, dated December 2003, provides documentation of the areal extent and depths of the contamination found in the surface soils, subsoils, groundwater, sediments, and surface waters at the CCP site. Information in the forthcoming *Final Phase II RFI Report* will include information from the following submittals: 1) *Phase II RFI Report*, dated December 2003, 2) *Flow-Through Process Tank Replacement Report – Revision 1*, dated December 10, 2004, and 3) *Surface Soil Sampling and Evaluation Results Report*, dated January 28, 2005.

The surface soils, subsoils, sediments, and groundwater that are impacted by the past releases of HCOCs from the facility is limited in size to an area of approximately 500 ft. x 600 ft. and to a depth of approximately 40 ft. below grade. Contamination is localized to the facility property based upon the investigation findings. The area with the highest concentrations of HCOCs in the subsoils and groundwater is limited to an area of approximately 200 ft. x 300 ft. The groundwater table is typically 20 to 25 ft below the ground surface in the areas showing the highest levels of contamination at the site.

The summary findings and details of the submitted *VI Report*, and the above submitted components of the *Phase II RFI Report* indicate that the existing contamination at the CCP site primarily includes VOCs and SVOCs in the subsoils and groundwater at the CCP site. The risk assessment evaluations have also indicated that inorganics contribute to the potential risks to human health in addition to the VOCs and SVOCs.

In the areas of highest contamination, the subsurface soils and groundwater HCOCs primarily include, but are not limited to the following: xylene, ethylbenzene, acetone, toluene, benzene, methyl-ethyl ketone (MEK), methyl-isobutyl ketone (MIBK), styrene, 2-hexanone, chloroform, acetophenone, phenol, dicyclopentadiene (DCPD), and phthalates.

Information in the *Phase II RFI Report*, dated December 2003, and the *Flow-Through Process Tank Replacement Report – Revision 1*, dated December 10, 2004, enables the DEQ to evaluate the human health risk assessment findings, and to establish whether the current human exposures to HCOCs in the subsoils, groundwater, sediments, and surface waters is under control at the CCP site.

The DEQ's summary of the human health risk assessment findings from the *Phase II RFI Report*, dated December 2003, and the *Flow-Through Process Tank Replacement Report – Revision 1*, dated December 10, 2004, is provided in a DEQ staff review comments memorandum entitled Summary of Human Health Risk Assessment Findings – Current Human Health Exposures Under Control Environmental Indicator (HHEI) - Update and Staff Summary, dated April 14, 2005. This above memorandum also provides an update regarding the status of the Current Human Health Exposures under Control Environmental Indicator (HHEI) (RCRIS code (CA725)) for the CCP facility.

Recent information received in *Surface Soil Sampling and Evaluation Results Report*, dated January 28, 2005, for the CCP facility enables the DEQ to evaluate the current human health exposures to HCOCs in surface soils and to complete the EPA's HHEI for the CCP site so to address requirements

regarding the Government Performance Results Act (GPRA).

The *Surface Soil Sampling and Evaluation Results Report* provided the data and the evaluation of the current incremental risk from potential exposure to HCOCs from the historical surface deposition of HCOCs from CCP's hazardous waste incinerator operations. (The CA risk assessment of the RFI needs to include an evaluation of the current potential risks of potential exposure to all media from the historical releases from the CCP facility. This includes historical releases from the CCP facility's incinerator operations.)

The DEQ's summary of the *Surface Soil Sampling and Evaluation Results Report* are provided in a DEQ staff review comments memorandum entitled Surface Soil Sampling and Evaluation Results Report, URS Submittal, January 28, 2005, HHEI Update – Staff Review Comments, dated March 31, 2005.

In the above DEQ memorandum, dated March 31, 2005, the staff summarized the risk assessment findings and determined that:

Based upon the findings and risk assessment in the above Report, the staff believes that current human health exposure to surface soils is under control at the CCP site. This above determination is based upon the fact that the only exposure pathway of concern is the hypothetical future child resident; the future child resident is not a current exposure pathway (at the CCP facility).

Therefore, all current human health exposure pathways to HCOCs in the surface soils are demonstrated to be under control under the current land-use.

The above findings, when combined with the risk assessment findings of the *Phase II RFI Report*, dated December 2003, should enable the staff to determine that the HHEI is under control for the CCP facility under the current land-use.

Based upon the staff's technical reviews, the staff believes that findings in the *Phase II RFI Report*, dated December 2003, and the *Flow-Through Process Tank Replacement Report – Revision 1*, dated December 10, 2004, are sufficient to evaluate the current human health exposures at the CCP site and to make a determination whether the current human exposures are under control at the CCP site based upon the nature and extent of the contamination found and the engineering and other controls at the site.

It should be noted that in the above Reports, the total risk is compared to the EPA reference range of  $1 \times 10^{-6}$  and  $1 \times 10^{-4}$  for carcinogens, while the noncarcinogens are compared to the EPA Hazard Index (HI) reference level of 1.0.

**A summary of the risk assessment findings regarding the potential exposures to HCOCs in the subsoils, groundwater, sediments, and surface waters at the CCP site are as follows:**

1. Based upon the HCOCs, exposure pathways, and data evaluated, the performance standards of  $1 \times 10^{-6}$  to  $1 \times 10^{-4}$  have been exceeded for the Future Adult/Child under the residential exposure scenario for groundwater and subsoils.
2. Based upon the HCOCs, exposure pathways, and data evaluated, the performance standards of  $1 \times 10^{-6}$  to  $1 \times 10^{-4}$  have been exceeded for the current commercial/industrial worker and the future construction worker exposure scenarios for groundwater and subsoils.
3. Based upon the HCOCs, exposure pathways, and data evaluated, the performance standard HI of 1.0 has been exceeded for the Future Adult/Child under the residential exposure scenario for groundwater and subsoils.

In the *Phase II RFI Report*, dated December 2003, the human health risk is identified Section 5.1.5, Human Health Risk Assessment-Groundwater, Section 5.16., Groundwater Summary, and 5.6.3, Risk Assessment, Soil Risks and Hazards, and Section 5.8.1., Shallow Soils and Sediment, and Section 5.8.4, Human Health Risk Assessment. (See attached excerpts of the Report in the above DEQ memorandum, dated April 14, 2005.)

In the *Flow-Through Process Tank Replacement Report – Revision 1*, dated December 10, 2004, the human health risk is identified in Section 5.0, Human Health Risk Assessment. (See attached excerpts of the Report in the above DEQ memorandum, dated April 14, 2005.)

Based upon the information in the above Reports and the DEQ staff's knowledge of the site, the existing engineering site controls are effective in preventing contact with the groundwater and subsoils and in mitigating the migration of groundwater to surface waters at the site. The existing engineering controls at the site include, but are not limited to: perimeter fencing, controlled access to the site, concrete and asphalt surface barriers, and two shallow groundwater collection and treatment systems. The potential human health risks under realistic scenarios are limited to potential exposure to outdoor volatile organic compound (VOC) vapors at the site. The Sample Area 5, which has the highest VOCs/HCOCs in subsoils and groundwater at the site, is covered either by asphalt or concrete, which would create a vapor barrier to prevent the HCOCs from reaching the facility personnel and construction workers at the site. (See attached figures in the above DEQ memorandum, dated April 14, 2005.)

Please note that the area of VOC contamination is below a semi-enclosed (open sided) and roofed area of the facility, which has a concrete floor. Workers at the CCP facility which may work indoors may include workers in the CCP facility laboratory, the control room, and in the pressing room, finishing room, office, etc. The indoor office is a stand-alone prefabricated structure approximately 200 ft. from the area of highest subsurface VOC contamination. The other noted manufacturing and process related areas have concrete floors and worker exposures to HCOCs and other process related chemicals should be based upon criteria, standards, and regulations under the Occupational Safety and Health Administration (OSHA), which is regulated under the Department of Labor. A more comprehensive evaluation of potential exposure to indoor air HCOCs will be a requirement of the *Final Phase II RFI Report*.

The facility is fully aware of the presence of HCOCs and the impacted media in the Sample Areas 3 and 5, etc., at the CCP site. In the event that subsurface activities are required, the facility will utilize a

contractor trained in hazardous materials management to conduct the excavation and management of impacted subsoils. Such excavation work and/or construction would require implementation of a Health and Safety Plan (H&SP) for work at the CCP site. A H&SP would require procedures to protect workers and would require utilization of a flame ionization detector (FID) or photo-ionization detector (PID) and use of personal protective equipment (PPE) (e.g., respirators, protective clothing, etc.) for workers in the impacted area at the CCP site.

All waste generated at the site would be managed, sampled, and tested to establish the proper method of waste management, storage, treatment, and disposal in accordance with the requirements of the Virginia Hazardous Waste Management Regulations (VHWMR), the Resource Conservation and Recovery Act (RCRA), the Virginia Solid Waste Management Regulations (VSWMR), and the DEQ requirements.

In summary, the findings in the *Phase II RFI Report*, dated December 2003, the *Flow-Through Process Tank Replacement Report – Revision 1*, dated December 10, 2004, and the *Surface Soil Sampling and Evaluation Results Report*, dated January 28, 2005, indicate that the current Human Health Exposures Under Control EI determination for the CCP facility should be a “YES” status for the (HHEI) (RCRIS code (CA725)). This “Yes” status indicates that there are no identified unacceptable current human exposures to contamination in excess of appropriate risk-based levels that can be reasonably expected under current land-use and groundwater-use conditions and with the current control measures in place (for all contamination subject to RCRA corrective action (CA) at or from the identified facility (i.e., site-wide)).

### **DEQ Plan for Further Action**

Future corrective action measures at the site will be based upon the submittal and evaluation of the *Final Phase II RFI Report*. The *Final Phase II RFI Report* should be submitted in 2005.

It should be noted, however, that although the HHEI has been met for the site (based upon the available information), the facility will be required to address the identified HCOCs contamination at the CCP site (which is primarily subsoils and groundwater) and undertake a Corrective Measures Study (CMS) to evaluate the alternatives to remediate the impacted media with the goal of achieving risk-based clean-up levels as necessary to protect human health and the environment in accordance with the requirements of the VHWMR, the RCRA, and applicable State laws and regulations.

CCP will be required to submit to the DEQ for approval a *Corrective Measures Study (CMS) Work Plan*. The CMS is to screen and evaluate a number of potential CA remedies, including any specified by the DEQ. Each potential CA remedy is to be evaluated in the CMS based upon the following: site conditions established under the RFI, the need to protect human health and the environment, and other criteria specified within the CCP facility's Permit. The evaluations under the CMS will be documented in a *CMS Report* submitted to the DEQ for approval and the EPA Region 3.

The *CMS Report* will be the primary basis for a corrective measures remedy selection for the CCP site, if needed. The alternative and proposed corrective measure remedies will undergo public notice and public meetings to receive comments in accordance with Permit requirements. The preferred corrective measures remedy will be established and implemented to protect human health and the environment and will also be based upon other criteria which includes, but is not limited to: long and short term effectiveness and performance of the remedy, reduction of toxicity, mobility, or volume of contamination, technical feasibility, cost, and acceptance by CCP, the State, the EPA, and the Community.

It must be stated that the goal of CA under the VHWMR, the RCRA, and the State Water Control Law is to restore degraded resources (soils and groundwaters, etc.) to levels which are protective of the most beneficial use.

Other potential future CA activities, if needed, may include a *Corrective Measures Implementation Work Plan*, the *Corrective Measures Design*, and *Corrective Measures Construction*.

## Site Description

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The Cook Composite and Polymers (CCP) facility in Chatham, Pittsylvania County, Virginia occupies approximately 68 acres of property in the Tight Squeeze Industrial Park. The CCP facility is located in Pittsylvania County that is the Piedmont physiographic province of south-central Virginia. The Banister River is located approximately 1,200 ft south of the CCP facility. Unnamed tributaries to the Banister River run just south of the CCP processing site. The environmental setting and updated site specific information is fully described in the *Phase II RFI Work Plan, Revision 2*, dated May 2003.

The CCP facility primarily produces unsaturated polyester resins for use in the manufacture of fiberglass boats, bathroom fixtures, sinks, and related specialty composite products.

## Environmental Indicator Status

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Under the Government Performance and Results Act (GPRA), EPA has set national goals to address high priority RCRA CA facilities by the year 2005. The CCP facility falls under the GPRA CA initiative and is considered a high priority facility by the EPA.

EPA is evaluating two key environmental indicators (EI's) for each facility: 1) Current Human Exposures under Control, and 2) Migration of Contaminated Groundwater under Control. Virginia's current evaluation of Environmental Indicators for this facility is as follows:

- *Human Exposures Controlled Determination:* The DEQ has made the EI determination of "yes, that current human exposures are under control." The above determination is based upon the

DEQ's Current Human Health Environmental Indicator (HHEI) Determination Report, dated April 20, 2005. This above HHEI determination is considered current, effective July 1, 2005.

- *Release to Groundwater Controlled Determination:* The DEQ has made the EI determination of "yes, that migration of contaminated groundwater is under control," based upon the review of CA information for the CCP site contained in the EI determination, dated September 25, 2003. The above EI determination indicates that the migration of "contaminated" groundwater is believed to be under control, and that monitoring will be conducted to confirm that contaminated groundwater remains within the "existing area of contaminated groundwater." This EI determination is considered current, effective July 1, 2005.

## Contaminants

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In the areas of highest contamination, the subsurface soils and groundwater HCOCs primarily include, but are not limited to the following: xylene, ethylbenzene, acetone, toluene, benzene, methyl-ethyl ketone (MEK), methyl-isobutyl ketone (MIBK), styrene, 2-hexanone, chloroform, acetophenone, phenol, dicyclopentadiene (DCPD), and phthalates. (See *Phase II RFI Report*, dated December 2003, for further details.)

## Community Interaction

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The Class 2 Permit modification, effective September 19, 2003, includes requirements for a Community Relations Plan (CRP). The CRP is a required element of the Phase II RFI Work Plan and the CA process. Cook Composites submitted a CRP to the DEQ on October 13, 2003. On November 24, 2003, the DEQ provided conditional approval of the CRP. The DEQ's conditional approval was contingent upon the resubmission of a revised CRP, which sufficiently addresses the staff comments. A revised CRP, dated December 2003, was submitted and on December 29, 2003, the DEQ sent a confirmation letter to CCP, which recognized that the items of the CRP conditional approval had been met.

**As part of the CRP, an information repository has been established at the Chatham Public Library, located at 24 Military Drive, Chatham, Virginia, 24531. The library is within 3.5 miles of the CCP facility. The phone number for the Chatham public library is (434) 432-3271. The information repository provides public access to interim documents and fact sheets, as well as final copies of work plans and technical reports related with CA at the CCP site.**

In addition to the above, procedures are established in the CA Permit modules and attachments to provide public notice, public mailings, and public meetings at critical decision points in the CA process. The public notice, mailings, and meetings were held during the Class 2 Permit modification to inform the public of the CA process, the RFI, and the IM for this facility. CA fact sheets for the RFI and the IM

at the facility were provided to the public in mailings and at the public meeting. The executive summary findings in the RFI Report will be mailed to citizens and agencies on the facility's public mailing list upon approval of the RFI Report by the DEQ.

If corrective measures are necessary, a CMS Report will be submitted to the DEQ for approval and the EPA Region 3. A corrective measures remedy selection will be based upon the alternative remedies presented and evaluated in the CMS Report. The corrective measures remedy will undergo public notice and public meetings in accordance with Permit requirements. Public comments will be considered in the selection of a final remedy for the CCP site. Future CA fact sheets will be developed, as believed needed.

## **Contacts**

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For more information about EPA's corrective action programs, including Environmental Indicators, please visit: <http://www.epa.gov/epaoswer/hazwaste/ca>

## **Factsheet Updates**

The previous factsheet was updated January 10, 2005. The next factsheet update is scheduled for January 1, 2006. Previous factsheets may be obtained through the listed DEQ contact.